

From: Polly Brunner [REDACTED] >
Sent: 25 August 2022 13:39
To: Section 62A Applications <section62a@planninginspectorate.gov.uk>
[REDACTED]
Subject: Berden Hall Farm (Pelham Solar)

Application number on S62A/22/0006 (and UTT/22/2046/PINS)

I am writing to object to the proposal by Statera to construct a solar farm on 177 acres of land at Berden Hall Farm.

My name is Polly Brunner
[REDACTED]

The reason for my objection is as follows:

The cumulative effect of the solar farm and the adjacent industrial battery storage facility is unacceptable.

- Paragraph 155 of the National Planning Policy Framework makes it clear that the adverse impacts of solar farms must be addressed satisfactorily and that the cumulative landscape and visual impacts of the proposed development must be considered.
- The cumulative impact of the hugely visible and poorly screened battery storage facility (built by Statera) and the proposed solar farm will completely industrialise this rural area.
- The size of the proposed solar farm is excessive. The location (i.e. next to the battery storage facility) has not been chosen because of its suitability but because it will be cheap for the developer.

Statera have not demonstrated that the use of high quality agricultural land is necessary

- Eddie Hughes MP, a Minister at the Ministry of Housing, Communities and Local Government confirmed in June 2021 that there the statements made by Eric Pickles in 2015 are still applicable. Therefore, Uttlesford must consider whether the use of agricultural land has been shown to be necessary.
- Uttlesford's Policy ENV5 also says that development of the best and most versatile agricultural land will only be permitted where opportunities have been assessed for accommodating development on previously developed sites or within existing development limits. Where development of agricultural land is required, developers should seek to use areas of poorer quality except where other sustainability considerations suggest otherwise.
- As the land identified for development is high-quality agricultural land its use must be justified by the most compelling evidence.

- In the FAQ document published by Statera on their development website: <http://pelhamsolar.co.uk/> the developer says the following:

Question: What other locations did you consider? Answer: None

- 19 October 2014, , Liz Truss (then a DEFRA Minister) said the following:

“English farmland is some of the best in the world and I want to see it dedicated to growing quality food and crops. I do not want to see its productive potential wasted and its appearance blighted by solar farms. Farming is what our farms are for and it is what keeps our landscape beautiful.

I am committed to food production in this country and it makes my heart sink to see row upon row of solar panels where once there was a field of wheat or grassland for livestock to graze. That is why I am scrapping farming subsidies for solar fields. Solar panels are best placed on the 250,000 hectares of south facing commercial rooftops where they will not compromise the success of our agricultural industry”.

Statera have not considered using roof tops

The Government does not support large scale solar development of this sort

- In October 2021 (in the run up to COP 26), the Government published its Net Zero Strategy (Build Back Greener). This Strategy does NOT support the construction of industrial scale solar farms. It's focus on renewable energy is almost entirely on off-shore wind energy with a commitment to generate 40GW of energy from offshore wind by 2030. This target was first set in 2020 in the Government's 10 point plan for a Green Industrial revolution which said that this quadrupling in offshore wind capacity would generate enough energy to power every home in the country.
- The focus on wind power explains why there are very few references to solar power in the Net Zero Strategy. Where solar is referenced, the focus is on “unsubsidised rooftop solar”, retrofitting solar on houses and small scale community solar projects.
- The East of England (including Uttlesford) has a key role to play in National renewable energy plans because 60% of the current offshore wind projects will come onshore along the East Coast. In fact, National Grid's Electricity 10 year Statement (published in 2020) says that the large amount of generation to be connected in the East of England means that power generation in the East of England will exceed local demand; so the East of England will be a power exporting region. We do not need more renewable energy in Uttlesford!
- The fact that Uttlesford DC declared a climate emergency in 2019 is irrelevant. This is not a planning policy and is not relevant for the purposes of determining planning applications.

Statera deliberately down-play impact on the listed buildings beside the solar farm

- Section 16 of the NPPF is concerned with ‘Conserving and enhancing the historic environment’. It identifies heritage assets as ‘an irreplaceable resource’ and notes that they should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- Paragraph 199 of the NPPF states that where development proposals are likely to affect a designated heritage asset, great weight should be given to the asset's conservation and any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justifications.

- The impact on the heritage significance of the Berden Hall (Grade 2* Listed) will be significant. Tithe maps dating from 1838 show that the land which is included within the solar farm site used to belong to the owner of Berden Hall (Nicholson Calvert) and that it was farmed by Isaac Hodges who lives in Berden Hall. There is clearly a close connection between the buildings and the land.
- The development will be visible from the bell tower in Berden Church (St Nicholas') which is a Grade 1 listed building. English Heritage have already raised concerns about the impact on this (and other) important historical assets in close proximity to the proposed development.
- The Scheduled monument at The Crump, the Grade II Listed The Crump and former barn (now room) adjoining to north-west will also be impacted by the development which will be visible from first floor windows of the Crump which looks West.

There is no benefit of this development to the local community.

Yours faithfully

Polly Brunner